

To: Strauss, Linda[Strauss.Linda@epa.gov]; Cleland-Hamnett, Wendy[Cleland-Hamnett.Wendy@epa.gov]; Wise, Louise[Wise.Louise@epa.gov]
Cc: Jakob, Avivah[Jakob.Avivah@epa.gov]
From: Beck, Nancy
Sent: Fri 7/7/2017 5:04:04 PM
Subject: RE: Urgent --chlorpyrifos desk statement 7/7/17

Ok- please just remove the highlight and the italics (unless there is a reason for it).

thanks

Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP

Ex. 6 - Personal Privacy

beck.nancy@epa.gov

From: Strauss, Linda
Sent: Friday, July 7, 2017 1:02 PM
To: Beck, Nancy <Beck.Nancy@epa.gov>; Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Cc: Jakob, Avivah <Jakob.Avivah@epa.gov>
Subject: RE: Urgent --chlorpyrifos desk statement 7/7/17

I'd like to send all of it to OPA b/c Liz said she wanted some details in the background to include in the response.

Ignore the yellow – that was just in Avivah's timeline which I inserted into the other info from the overview section.

I'll need to get OGC review too.

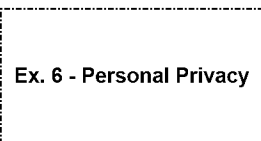
Linda

From: Beck, Nancy
Sent: Friday, July 07, 2017 12:57 PM
To: Strauss, Linda <Strauss.Linda@epa.gov>; Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Cc: Jakob, Avivah <Jakob.Avivah@epa.gov>
Subject: RE: Urgent --chlorpyrifos desk statement 7/7/17

What are we sending exactly and what is the yellow highlight for?

Nancy B. Beck, Ph.D., DABT

Deputy Assistant Administrator, OCSPP



beck.nancy@epa.gov

From: Strauss, Linda
Sent: Friday, July 7, 2017 12:41 PM
To: Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Beck, Nancy <Beck.Nancy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Cc: Jakob, Avivah <Jakob.Avivah@epa.gov>
Subject: RE: Urgent --chlorpyrifos desk statement 7/7/17
Importance: High

From: Strauss, Linda
Sent: Friday, July 07, 2017 12:37 PM
To: Cleland-Hamnett, Wendy <Cleland-Hamnett.Wendy@epa.gov>; Beck, Nancy <beck.nancy@epa.gov>; Wise, Louise <Wise.Louise@epa.gov>
Cc: Jakob, Avivah <Jakob.Avivah@epa.gov>
Subject: Urgent --chlorpyrifos desk statement 7/7/17

Liz B. wants a desk statement ASAP (“if one hasn’t been created already.”) The timeline/details (other assignment) “can be done by Monday, but we at least need a few main details for background to include in the response on this as soon as possible.”

OK to go with this?

From: Keigwin, Richard
Sent: Friday, July 07, 2017 12:33 PM
To: Strauss, Linda <Strauss.Linda@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: RE: need ASAP --chlorpyrifos desk statement 7/7/17

No comments.

From: Strauss, Linda
Sent: Friday, July 07, 2017 12:26 PM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Sisco, Debby <Sisco.Debby@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: need ASAP --chlorpyrifos desk statement 7/7/17
Importance: High

Rick, see below request from Liz B. for a desk statement ASAP in response to Reuters and other press. Here is our previous OGC-approved desk statement (tenses changed) with excerpts from Avivah’s excellent timeline. Any edits/additions?

REUTERS: All, Five states and DC have filed a motion to intervene in the federal legal case before the 9th Circuit over the safety of chlorpyrifos, objecting to Administrator Pruitt's decision to keep the pesticide on the market. AP's story will note that EPA has still not cited the scientific studies that the administrator says he reviewed in making his decision. If you have those now, please send them along.

Desk Statement

EPA concluded that, despite several years of study, the science addressing neurodevelopment effects remains **unresolved and that further evaluation of the science** during the remaining time for completion of registration review -- the periodic review of existing registered pesticides to ensure they can be used without unreasonable risks to human health and the environment -- **is warranted** to achieve greater certainty as to whether the potential exists for adverse neurodevelopmental to occur from current human exposures to chlorpyrifos.

EPA therefore concluded that it will not complete the human health portion of the registration review or any associated tolerance revocation of chlorpyrifos without first attempting to come to a **clearer scientific resolution** on those issues. As noted, Congress had provided that EPA must complete registration review by October 1, 2022. Because the 9th Circuit's August 12, 2016 order has made clear, however, that further extensions to the March 31, 2017 deadline for responding to the Petition would not be granted, EPA denied all remaining petition claims.

Background (taken from Avivah's piece):

- Currently, chlorpyrifos remains registered and is being re-evaluated through EPA's re-evaluation program, registration review.
- In September 2007 the Pesticide Action Network of North America (PANNA) and Natural Resources Defense Council (NRDC) submitted a petition seeking

revocation of all tolerances (maximum residue levels in food) and cancellation of all chlorpyrifos registrations.

- Over the past several years, EPA has conducted several risk assessments in response to this petition.

- FIFRA Scientific Advisory Panel (SAP) Reviews

- o EPA took most of the complex and novel science questions raised in the petition to the FIFRA SAP for review several times.

- o Specifically, EPA requested the SAP to review new worker and non-occupational exposure methods, experimental toxicology and epidemiology, risk assessment approaches for semi-volatile pesticides, and the evaluation of a pharmacokinetic-pharmacodynamic model.

- *Despite several years of study, EPA concluded that the science addressing neurodevelopment effects remains unresolved and that further evaluation of the science during the remaining time for completion of registration review is warranted.*

- In March 2017, EPA denied the petition.

- EPA will continue to evaluate the potential risks posed by chlorpyrifos as part of the ongoing registration review and intends to complete our assessment by the statutory deadline of October 1, 2022.

All documents related to the registration review can be located in the registration review docket [EPA-HQ-OPP-2008-0850](#) located at www.regulations.gov

From: Grantham, Nancy

Sent: Friday, July 07, 2017 11:50 AM

To: Bowman, Liz <[Bowman.Liz@epa.gov](mailto: Bowman.Liz@epa.gov)>; Wilcox, Jahan <wilcox.jahan@epa.gov>

Cc: Hewitt, James <hewitt.james@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>

Subject: RE: Reuters: U.S. state prosecutors join push to ban pesticide chlorpyrifos, 7/7/17

Yes .. and I understand that avivah is working on a timeline as well

Nancy Grantham

Office of Public Affairs

US Environmental Protection Agency

202-564-6879 (desk)

202-253-7056 (mobile)

From: Bowman, Liz

Sent: Friday, July 07, 2017 11:44 AM

To: Grantham, Nancy <Grantham.Nancy@epa.gov>; Wilcox, Jahan <wilcox.jahan@epa.gov>

Cc: Hewitt, James <hewitt.james@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>

Subject: RE: Reuters: U.S. state prosecutors join push to ban pesticide chlorpyrifos, 7/7/17

Great, thanks...we also need to continue to work through the larger details on this issue, with the timeline, etc. That can be done by Monday, but we at least need a few main details for background to include in the response on this as soon as possible.

From: Grantham, Nancy

Sent: Friday, July 7, 2017 11:40 AM

To: Bowman, Liz <Bowman.Liz@epa.gov>; Wilcox, Jahan <wilcox.jahan@epa.gov>

Cc: Hewitt, James <hewitt.james@epa.gov>; Strauss, Linda <Strauss.Linda@epa.gov>;

Grantham, Nancy <Grantham.Nancy@epa.gov>

Subject: RE: Reuters: U.S. state prosecutors join push to ban pesticide chlorpyrifos, 7/7/17

All .. I just happened to be on the phone with linda strauss – ocspp comms --- when this came through –

She will work with Avivah – a special assistant in ocspp who nancy beck has charged with working on this issue – so linda will work with her to get us a draft holding statement shortly.

Thanks ng

Nancy Grantham

Office of Public Affairs

US Environmental Protection Agency

202-564-6879 (desk)

202-253-7056 (mobile)

From: Bowman, Liz

Sent: Friday, July 07, 2017 11:35 AM

To: Wilcox, Jahan <wilcox.jahan@epa.gov>

Cc: Hewitt, James <hewitt.james@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>

Subject: FW: Reuters: U.S. state prosecutors join push to ban pesticide chlorpyrifos, 7/7/17

Can you please work with Nancy Beck and Nancy G on a holding statement on this issue (if one hasn't already been created)? Thank you

From: Sorokin, Nicholas

Sent: Friday, July 7, 2017 11:26 AM

To: AO OPA OMR CLIPS <AO_OPA_OMR_CLIPS@epa.gov>

Subject: Reuters: U.S. state prosecutors join push to ban pesticide chlorpyrifos, 7/7/17

Reuters

<http://www.reuters.com/article/usa-environment-lawsuit-pesticide-idUSL1N1JX11J>

U.S. state prosecutors join push to ban pesticide chlorpyrifos

By Emily Flitter, 7/6/17

Six state prosecutors are seeking to join a lawsuit to force the U.S. Environmental Protection Agency to ban the pesticide chlorpyrifos from use on U.S.-grown fruits and vegetables, according to court papers filed on Thursday.

Democratic attorneys general for New York, Maryland, Vermont, Washington, Massachusetts and the District of Columbia filed a motion to intervene in a case environmental and social advocacy groups brought in a federal appeals court on June 5. It challenges EPA Administrator Scott Pruitt's March 29 decision not to ban chlorpyrifos from U.S. foods. The action by the prosecutors adds momentum to a push by environmental groups to broadly oppose Pruitt and U.S. President Donald Trump in their stated aim to loosen U.S. environmental regulations.

"It is EPA's responsibility to protect Americans from unsafe chlorpyrifos residues on food because of the potential neurodevelopmental and other adverse health effects caused by exposure," the prosecutors wrote in their filing. "Citizens of the proposed state intervenors consume foods grown throughout the United States and the world that contain chlorpyrifos residues."

The EPA has previously said chlorpyrifos, which is sold under a range of brandnames, did not meet safety standards laid out by a 1938 U.S. law, the Federal Food, Drug and Cosmetic Act. An EPA spokesman declined to comment on Thursday's filing.

The prosecutors' move is the latest in a series of administrative and courtroom actions against the pesticide that began long before Trump took office.

In 2007, environmental groups petitioned the EPA to revoke its tolerance of chlorpyrifos residues on food.

Over the next nine years, the groups obtained a series of court decisions forcing action by the

EPA, which said in 2015 it was "unable to conclude that the risk from aggregate exposure" to the pesticide was safe.

Environmental groups have argued humans are exposed to harmful elements in chlorpyrifos not only by eating food containing residues of the pesticide, but also by drinking water contaminated by it.

The EPA issued two proposals to ban chlorpyrifos but never produced a final rule, despite being ordered by a court on two separate occasions to take final action on the matter. Pruitt's March administrative order reversed the agency's moves to ban the pesticide, denying the 2007 petition for the ban.

The case is *League of United Latin American Citizens v. Scott Pruitt*, U.S. Court of Appeals, Ninth Circuit, 17-71636.

Nicholas Sorokin

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